

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE NEW YORK TIMES COMPANY,

Plaintiffs,

-against-

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC,

Defendants.

Case No. 1:23-cv-11195-SHS

X

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**AFFIDAVIT OF ROSE S. LEE IN SUPPORT OF MOTION TO ADMIT COUNSEL  
*PRO HAC VICE***

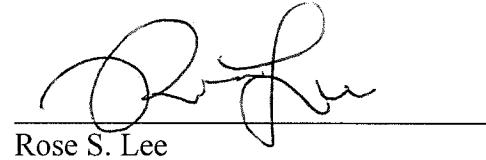
I, Rose S. Lee, being duly sworn deposes and says as follows:

1. I am a Partner at the law firm of Morrison & Foerster LLP.
2. I submit this declaration in support of the motion for my admission *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of California.
4. I have never been convicted of a felony.
5. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
6. There are no pending disciplinary proceedings in any state or federal court.
7. I respectfully request admission *pro hac vice* to appear as counsel in this matter for defendants OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, and OPENAI HOLDINGS, LLC.

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 8, 2024  
Palo Alto, California

By:

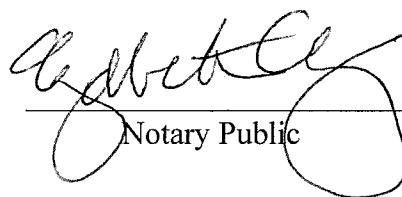


Rose S. Lee

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

Subscribed and sworn to (or affirmed) before me on this 8th day of February, 2024, by  
Rose S. Lee, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Elizabeth Gutierrez  
Notary Public

(Seal)

